

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division

CONSUMER FINANCIAL PROTECTION
BUREAU; COMMONWEALTH OF
MASSACHUSETTS; THE PEOPLE OF
THE STATE OF NEW YORK, by LETITIA
JAMES, Attorney General of the State of
New York; and COMMONWEALTH OF
VIRGINIA, *EX REL.* MARK R. HERRING,
ATTORNEY GENERAL,

Plaintiffs,

v.

NEXUS SERVICES, INC.; LIBRE BY
NEXUS, INC.; MICHEAL DONOVAN;
RICHARD MOORE; and EVAN AJIN,

Defendants.

Case No.: 5:21-cv-00016-EKD

MOTION FOR *PRO HAC VICE* ADMISSION OF DAVID G. BAYLES

I, Samantha K. Collins, an active member in good standing of the Bar of the United States District Court for the Western District of Virginia, request that this Court admit David G. Bayles *pro hac vice* as counsel of record for defendants Nexus Services, Inc., Libre by Nexus, Inc., Micheal Donovan, Richard Moore, and Evan Ajin in the above-named case pursuant to W.D. Va. Gen. R. 6(d).

Mr. Bayles is a member in good standing of the Bar of the State of California (Bar No. 208112) and the Bar of the State of Utah (Bar No. 8147) and he is admitted to practice before the highest court of the State of California and the highest court of the State of Utah. His contact information is below:

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In accordance with W.D. Va. Gen. R. 6(d), if this motion is granted, Mr. Bayles will promptly register as a NextGen e-filer with the Western District of Virginia and e-file a notice of appearance in this case.

Dated: August 16, 2021

Respectfully submitted,

*Counsel for defendants Nexus Services, Inc., Libre by
Nexus, Inc., Micheal Donovan, Richard Moore, and
Evan Ajin*

s/ Samantha K. Collins
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